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January 11, 2022

**VIA E-FILING**

Hon. Eric R. Komitee, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: *Calderon v. Royal Elite Palace Caterers, LLC* – Case No.: 21-cv-6367(EK)(MMH)

**LETTER MOTION FOR AN EXTENSION OF TIME TO FILE AN ANSWER OR  
OTHERWISE RESPOND TO COMPLAINT**

Dear Honorable Judge Eric R Komitee:

The undersigned counsel represents Defendant Abhi Vaynshteyn And Elite Palace LLC (“Defendants”) in the above-referenced matter. Pursuant to the Honorable Judge Marcia M. Henry’s January 10, 2022 order, instant Counsel has filed a Notice of Appearance on behalf of Defendant Abhi Vaynshteyn and Elite Palace LLC. Elite Palace LLC has not been in operation since May 2014, and Royal Elite Palace LLC is a complete and separate entity with no ties to Defendants Mr. Vaynshteyn and Elite Palace LLC.

I write with the consent of counsel for Plaintiff to request that the above-referenced Defendants’ time to file an Answer or move in response to Plaintiff’s Complaint be extended to February 21, 2022 (45 days from today’s date). Furthermore, I have spoken with co-Defendants Counsel for Royal Elite Palace LLC and with their consent filed this stipulation as well.

The purpose of this extension is that counsel for Defendants have just been retained, and to allow counsel for Defendant to produce any preliminary documents that may resolve the matter. This is the first request for such relief and no party to this matter shall be prejudiced by such extension.

We appreciate the Court’s attention to this matter. Should Your Honor have any further questions, we remain at the Court’s disposal.

Respectfully submitted,

/s/ Steven R. Yuniver  
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